

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF OKLAHOMA**

CHIEFTAIN ROYALTY COMPANY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-18-1225-J
	)	
SM ENERGY COMPANY (including	)	
Predecessors, successors, and affiliates),	)	
	)	
Defendant.	)	

**SUPPLEMENTAL DECLARATION OF JENNIFER M. KEOUGH ON BEHALF  
OF SETTLEMENT ADMINISTRATOR, JND LEGAL ADMINISTRATION LLC,  
REGARDING NOTICE MAILING AND ADMINISTRATION OF SETTLEMENT**

I, JENNIFER M. KEOUGH, declare and state as follows:

1. I am the Chief Executive Officer of JND Legal Administration (“JND”). This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees, and if called upon to do so, I could and would testify competently thereto.

2. On March 26, 2021, I executed my Declaration of Jennifer M. Keough on Behalf of Settlement Administrator, JND Legal Administration LLC, Regarding Notice Mailing and Administration of Settlement. I submit this Supplemental Declaration to update the Court regarding developments since that time.

**NOTICE MAILING**

3. As of the date of this Supplemental Declaration, JND has tracked 474 Short Form Notices that had been returned to JND as undeliverable, including six that were returned with a forwarding address provided by USPS and were promptly re-mailed. JND

was able to locate a new address for 131 of the remaining returned notices. Two of the notices that were forwarded or re-mailed in this manner have been returned as undeliverable.

#### **SETTLEMENT WEBSITE**

4. As of the date of this Supplemental Declaration, the website has tracked 173 unique users with over 482 pageviews. A single visitor to the website can register multiple views.

#### **TOLL-FREE TELEPHONE NUMBER**

5. As of the date of this Supplemental Declaration, the toll-free number has received 58 calls.

#### **REQUESTS FOR EXCLUSION**

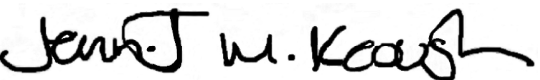
6. As of the date of this Supplemental Declaration, JND has not received any requests for exclusion.

#### **OBJECTIONS**

7. As of the date of this Supplemental Declaration, JND has not received any objections.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 20, 2021, at Seattle, Washington.

BY:   
JENNIFER M. KEOUGH